

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BEHROUZ SHOKRI,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware  
Corporation,

Defendant.

No. 2:16-cv-01132 RSM

STIPULATION AND ORDER TO  
EXTEND THE STAY AND THE TIME  
FOR PLAINTIFF TO RESPOND TO  
DEFENDANT'S MOTION FOR COSTS,  
DKT 147

Plaintiff Behrouz Shokri ("Plaintiff") and Defendant The Boeing Company ("Defendant") (together, the "Parties"), by and through their counsel of record, hereby agree and stipulate to extend the stay of proceedings related to Defendant's Motion for Costs (*Dkt.* 147), and extend the deadline for Plaintiff to file a response to Defendant's Motion for Costs to seven days after a mandate is issued in Plaintiff's appeal. In support, the Parties state as follows:

1. On April 25, 2018, this Court granted Defendant's Motion for Summary Judgment.

2. On May 10, 2018, Defendant filed a Motion for Costs pursuant to F.R.Civ.P. 54(d) and Local Civil Rule ("LCR") 54(d) (*Dkt.* 147).

1           3.       The District Court granted the parties' stipulation and proposed order staying  
2 proceedings regarding Defendant's motion for costs on May 18, 2018 (*Dkt.* 149).

3           4.       Plaintiff filed an appeal of the District Court's rulings on May 22, 2018 (*Dkt.*  
4 150).

5           5.       The Ninth Circuit filed and entered a judgment on July 2, 2019 (*Dkt.* 155).

6           6.       Plaintiff intends to file a petition for rehearing/rehearing en banc before a  
7 mandate is issued.

8  
9           THEREFORE, the Parties stipulate and agree as follows:

10          1.       All proceedings related to Defendant's Motion for Costs (*Dkt.* 147), including  
11 all responsive briefing and resolution of the motion, is stayed pending the issuance of a  
12 mandate pursuant to Plaintiff's appeal. Plaintiff will file any opposition to Defendant's Motion  
13 for Costs within seven days of the issuance of a mandate.

14  
15 STIPULATED to this 3<sup>rd</sup> day of July, 2019.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Attorneys for Plaintiff:

By: s/ Scott C. G. Blankenship  
Scott C. G. Blankenship, WSBA No. 21431  
Richard E. Goldsworthy, WSBA No. 40684  
The Blankenship Law Firm, PLLC  
1000 Second Avenue, Suite 3250  
Seattle, WA 98104  
Telephone: (206) 343-2700  
Facsimile: (206) 343-2704  
sblankenship@blankenshiplawfirm.com  
rgoldsworthy@blankenshiplawfirm.com

Attorneys for Defendant:

By: s/ Matthew J. Scarbaugh  
Lincoln O. Bisbee, Admitted *Pro Hac Vice*  
Matthew J. Scarbaugh, Admitted *Pro Hac Vice*  
Morgan Lewis & Blockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
Telephone: (202) 739-3000  
Facsimile: (202) 739-3001  
lincoln.bisbee@morganlewis.com  
matthew.scarbaugh@morganlewis.com

Laurence A. Shapero, WSBA No. 31301  
Ogletree, Deakins, Nash, Smoak  
& Stewart, P.C.  
800 Fifth Avenue, Suite 4100  
Seattle, WA 98104  
Telephone: (206) 876-5301  
Facsimile: (206) 693-7058  
laurence.shapero@ogletree.com

Clifford D. Sethness, WSBA No. 14110  
Morgan, Lewis & Bockius LLP  
300 South Grand Avenue, 22nd Floor  
Los Angeles, CA 90071  
Telephone: (213) 612-2500  
Facsimile: (213) 612-2501  
clifford.sethness@morganlewis.com

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED this 9 day of July 2019.



**RICARDO S. MARTINEZ**  
CHIEF UNITED STATES DISTRICT JUDGE